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9 *Attorneys for the Plaintiffs*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

13 ERICA BLUTH, an individual, and  
14 LAVORIA WILSON, an individual,

15 Plaintiff,

16 v.

17 TYLER BAEHR, and individual, and THE  
18 CITY OF RENO, a political subdivision of  
19 the State of Nevada.,

20 Defendants.

22 Case No.: 3:25-cv-00129-ART-CSD

23 **STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR JOINT  
CASE MANAGEMENT REPORT  
AND RESCHEDULE CASE  
MANAGEMENT CONFERENCE**

24 Pursuant to the Court's Order Setting Case Management Conference issued on  
25 March 31, 2025 (ECF No. 9), Plaintiffs Erica Bluth and Lavoria Wilson, by and through  
26 their counsel, and Defendant City of Reno, by and through its counsel, hereby stipulate  
27 and respectfully request that the Court: (1) extend the deadline to file the Joint Case  
28

1 Management Report, currently set for April 28, 2025, by thirty (30) days to May 28,  
2 2025; and (2) reschedule the case management conference, currently set for May 1,  
3 2025, to a date on or after June 2, 2025, at the Court's convenience.

4 This request is made due to Defendant Tyler Michael Baehr's failure to appear  
5 and his request for an extension to respond to the Complaint to retain counsel.  
6

7 On March 5, 2025, Plaintiffs filed their Complaint (ECF No. 1) against Defendants  
8 Baehr and the City of Reno, alleging violations of constitutional and state law rights  
9 arising from traffic stops in 2023 and 2024. The City of Reno filed its Answer on March  
10 28, 2025 (ECF No. 6).

11 On or about April 14, 2025, during the Rule 26(f) conference, counsel for  
12 Plaintiffs and the City of Reno discussed Baehr's lack of response. Baehr, through his  
13 criminal defense counsel, has requested an extension of time to respond to the  
14 Complaint, indicating he is seeking to retain counsel to represent him in this matter.  
15 This request was communicated to Plaintiffs' counsel.

16 The Court's Order (ECF No. 9) requires the parties to file a Joint Case  
17 Management Report by April 28, 2025, and attend a mandatory case management  
18 conference on May 1, 2025.

19 Baehr's failure to appear and lack of counsel have hindered the parties' ability to  
20 fully comply with the Court's order, as a comprehensive Joint Case Management  
21 Report requires input from all parties, including Baehr, to address settlement,  
22 discovery, and other required topics.

23 Plaintiffs and the City of Reno have met and conferred on April 14, 2025, and  
24 agree that a 30-day extension of the Joint Case Management Report deadline and  
25

1 rescheduling of the case management conference are necessary to allow Baehr time to  
2 retain counsel and participate, thereby ensuring a complete and meaningful report and  
3 conference.

4 NOW, THEREFORE, the undersigned parties stipulate and request that the  
5 deadline to file the Joint Case Management Report, currently set for April 28, 2025, be  
6 extended by thirty (30) days to May 28, 2025, and the case management conference,  
7 currently scheduled for May 1, 2025, at 9:00 a.m., be rescheduled to a time convenient  
8 to the Court.

9  
10 Dated: Apr 25, 2025

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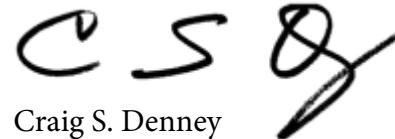
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*Attorney for Defendant City of Reno*

1 ORDER  
2

3 The deadline for the parties to file the Joint Case Management Report is  
4 extended to Friday, May 23, 2025.  
5

6 The case management conference is rescheduled to Wednesday, May 28, 2025, at  
7 9:00 a.m.  
8

9 IT IS SO ORDERED:  
10

11   
12 Craig S. Denney  
13

14 UNITED STATES MAGISTRATE JUDGE  
15

16 DATED: April 28, 2025  
17